

# United States Environmental Protection Agency / Region 4

## **Risk Management Program Inspection Report**

**Mizkan America, Inc.**

Owensboro, Kentucky

April 14, 2016

### **1.0 Introduction**

Several planning and legislative initiatives are part of the U.S. Environmental Protection Agency's (EPA) efforts to reduce the likelihood and severity of chemical accidents. These include the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act, and the Accidental Release Prevention requirements under Section 112(r) of the Clean Air Act (CAA), as amended in 1990. This report outlines an inspection of the Risk Management Program as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection is the Risk Management Program for the ammonia refrigeration process at the Mizkan America, Inc. facility (Mizkan) located in Owensboro, Kentucky. This facility was selected for inspection based on geographic location and because it had not been inspected under the Risk Management Program in over five years. The inspection, which was conducted on April 14, 2016 consisted of an examination of program documentation as well as site reviews of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Numerous documents were duplicated for review off-site. This report will provide a background of the facility and a listing of the observations.

### **2.0 Background**

The Mizkan America, Inc. facility is located in Owensboro, Daviess County, Kentucky. The facility specializes in the production of tomato sauces. The facility cycles anhydrous ammonia through various physical states which provides refrigeration in order to provide cooling capabilities for storage of their products. The process is regulated as program level 3. According to facility records, the facility has a maximum of 11,769 pounds of ammonia on site. The ammonia refrigeration process at the facility is subject to the Risk Management Program requirements of 40 CFR 68 and EPCRA Section 302. The facility is also subject to the requirements of OSHA Process Safety Management (PSM) in accordance with 29 CFR 1910.119. The background specifics are summarized as follows in Table 1.

**TABLE 1: Inspection Information Summary**

#### **Inspection Team**

Lead Inspector as a trainee: Jordan Noles

Inspector: Deanne Grant

Inspector in training: Danielle Refuge

Date of Facility Visit: April 14, 2016

### Facility Identification

Name: Mizkan America, Inc.  
Street Address: 1901 Ragu Drive  
City: Owensboro County: Daviess State: Kentucky Zip: 42302  
EPA Facility ID No: 1000 0020 3601  
Latitude: 37.764556  
Longitude: -087.075917

Name, address and phone of corporate parent company:

Owner/Operator: Mizkan America  
Mailing Address: 1901 Ragu Drive  
City: Owensboro State: Kentucky Zip: 42302  
Phone: (270) 926-3300

Name, title, and email of person responsible for 40 CFR Part 68 implementation:

Name: Travis Farley  
Title: Maintenance Manager  
Phone: (270) 926-3300  
Email: travis.farley@mizkan.com

Name and title of emergency contact:

Name: Travis Farley  
Title: Maintenance Manager  
Phone: (270) 926-3300  
24-hour Phone: (270) 313-9269  
Email: travis.farley@mizkan.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name: Travis Farley  
Title: Maintenance Manager  
Phone: (270) 313-9269  
Email: travis.farley@mizkan.com

Name: Chad Underhill  
Title: ESH Coordinator  
Phone: (270) 313-1875  
Email: chad.underhill@mizkan.com

Name: Charles Borman  
Title: Safety Director  
Email: Charles.borman@mizkan.com

*Note: This is not a union facility. Facility representative indicated hourly employees were sent a notice about the inspection, but none wanted to participate.*

### Date and Program Levels of Submitted Risk Management Plan (RMP)

Date of initial submission: 08/18/2008 (Unilever)

Date of subsequent submissions: 04/17/2012(Unilever), 09/15/2014(Mizkan)

Process as reported in RMP: Ammonia Refrigeration

Process 1 ID: 1000057185

Program Level as reported in RMP: 3

NAICS code: 311941 (Mayonnaise, Dressing, and Other Prepared Sauce Manufacturing)

### 3.0 Observations

The inspection of the Mizkan America, Inc. facility evaluated various sections of the Risk Management Program regulations (40 CFR Part 68, Program Level 3) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection included discussions with the facility representatives regarding a myriad of issues related to the operation of its chemical process, the facility’s risk management program, a review of paperwork associated with the facility’s most recent Risk Management Plan (RMP), and a tour of the facility. An inspection in-brief and out-brief were conducted. Observations from the Risk Management Program inspection at the Mizkan America, Inc. facility are discussed below:

- 40 CFR 68.30(c) requires the owner or operator to use the most recent Census data, or other updated information, to estimate the population potentially affected.
  - The facility used census data from 2000 for the offsite consequence analysis. Census data from 2010 was available at the time of the inspection.
- 40 CFR 68.65(b) requires information pertaining to the hazards of the regulated substances in the process.
  - The red quadrant of the NFPA diamond on the door to the engine room contained a value of one (1). The Refrigeration System Classification section of the International Mechanical Code (IMC) requires a value of three (3) for the red quadrant (flammability hazard) for indoor ammonia refrigeration equipment (IMC Table 1103.1).
- 40 CFR 68.65(d)(1)(iv) requires the process safety information to include information pertaining to the relief system design and design basis in the process.
  - Facility representatives provided relief line calculations that were completed the date of the inspection by a contractor (Shambaugh & Sons). 40 CFR 68.65(a) requires this information to be compiled before conducting the process hazard analysis. The process hazard analysis was conducted August 22, 2014. Shambaugh & Sons did not provide services to the facility in 2014.
- 40 CFR 68.65(d)(2) requires documentation that equipment complies with recognized and generally accepted good engineering practices.
  - The king valve on the high pressure receiver was not labeled. International Institute of Ammonia Refrigeration Bulletin 109, Section 4.10.3 indicates, “The main shut off valve(s) (king valve(s)) should be identified with a prominent sign having letters sufficiently large to be easily read.”

- 40 CFR 68.69(c) requires the owner or operator to certify annually that the operating procedures are current and accurate.
  - Facility representatives could not provide evidence that the operating procedures were certified in 2015.
- 40 CFR 68.73(d)(4) requires the owner or operator to document each inspection and test that has been performed on process equipment.
  - Facility representatives provided documentation of inspections and tests performed on the process equipment from August 2014 through September 2014, and August 2015 through the day of the inspection. Facility representatives could not provide documentation of inspections and tests for the time period of October 2014 through July 2015.

**Signatures:**

Lead Inspector:

\_\_\_\_\_  
Jordan Noles

\_\_\_\_\_  
Date

Region 4 RMP Coordinator:

\_\_\_\_\_  
Deanne Grant

\_\_\_\_\_  
Date

Approved by Section Chief:

\_\_\_\_\_  
Robert W. Bookman

\_\_\_\_\_  
Date